

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

TIMOTHY TIDWELL,

Plaintiff,

v.

FERRELL ENTERPRISES, INC.,

Defendant.

Civil Action No.: 1:19-cv-02942-JPB

**JOINT DISMISSAL WITH PREJUDICE**

COME NOW plaintiff Timothy Tidwell (“Plaintiff”) and defendant Ferrell Enterprises, Inc. (“Defendant”) (collectively, the “Parties”), by and through their undersigned counsels of record, and pursuant to Fed.R.Civ.P. 41(a), hereby voluntarily dismiss the above-referenced lawsuit WITH prejudice. The Parties respectfully request the Clerk of Court mark this matter dismissed WITH prejudice.

*[signatures on following page]*

Respectfully submitted this twenty-eighth (28<sup>th</sup>) day of January, 2020.

s/John P. Fuller

John P. Fuller, Esq. (*pro hac vice*)  
(by Erin A. Easley, with express  
permission)

Fuller, Fuller & Associates, P.A.  
12000 Biscayne Blvd., Suite 502  
North Miami, FL 33181  
Telephone: (305) 891-5199  
Facsimile: (305) 893-9505  
[jpf@fullerfuller.com](mailto:jpf@fullerfuller.com)

and

Jimmy Hwang, Esq.  
GA Bar No. 381251  
Law Office of Jimmy Hwang  
5008 Buford Highway, Suite C  
Atlanta, GA 30341-3531  
Telephone: (678) 723-4444  
Facsimile: (678) 723-4445  
[jhwang@jhlawga.com](mailto:jhwang@jhlawga.com)  
*Attorneys for Plaintiff*

s/Erin A. Easley

Erin Schaub Easley, Esq.  
Georgia Bar No. 897138  
Morgan Easley, LLC  
555 Sun Valley Drive, Suite J4  
Roswell, GA 30076  
Telephone: (770) 383-4660  
Facsimile: (770) 383-4661  
[ee@morganeasley.com](mailto:ee@morganeasley.com)  
*Attorneys for Defendant*

**RULE 7.1 CERTIFICATE OF COMPLIANCE**

The foregoing document is double spaced in 14-point Times New Roman font and complies with the type-volume limitation set forth in Local Rule 5.1C.

MORGAN EASLEY, LLC

By: s/Erin A. Easley  
Erin A. Easley, Esq.  
GA Bar No. 897138

555 Sun Valley Drive, Suite J4  
Roswell, GA 30076  
Tel.: (770) 383-4660  
Fax: (770) 383-4661  
[ee@morganeasley.com](mailto:ee@morganeasley.com)

**CERTIFICATE OF SERVICE**

I electronically filed the *Joint Dismissal with Prejudice* with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record:

Jimmy Hwang, Esq.  
[jhwang@jhlawga.com](mailto:jhwang@jhlawga.com)

John P. Fuller, Esq.  
[jpf@fullerfuller.com](mailto:jpf@fullerfuller.com)  
*Attorneys for Plaintiff*

This twenty-eighth (28<sup>th</sup>) day of January, 2020.

MORGAN EASLEY, LLC

By: s/Erin A. Easley  
Erin A. Easley, Esq.  
GA Bar No. 897138

555 Sun Valley Drive, Suite J4  
Roswell, GA 30076  
Tel.: (770) 383-4660  
Fax: (770) 383-4661  
[ee@morganeasley.com](mailto:ee@morganeasley.com)